

# Exhibit 2

PARTICIPANT NUMBER \_\_\_\_\_  
LAST NAME, FIRST NAME \_\_\_\_\_

### QUESTIONNAIRE FOR PROSPECTIVE JURORS

Members of the jury panel:

Please assist the Court and the Attorneys to seat a fair and impartial jury to hear this case. Answer the questions that appear in this questionnaire in an honest and straightforward manner to the best of your ability. You are required as a prospective juror to give completely truthful answers to each question. Please be advised that you will be asked to sign and affirm your answers at the conclusion of the questionnaire.

If you do not wish to answer any question on this form because you believe it intrudes too much on your privacy, then please print the word "PRIVATE" for your answer. You may be asked to provide additional information outside the presence of other jurors. Please do not leave any space blank and be sure to **PRINT ALL YOUR ANSWERS**. If you wish to make further comments regarding any of your answers, please use the last page and indicate the corresponding question number. Please do not write on the back of any page. If you have any questions or problems filling out this form, please advise the Officer of the Court.

After the court completes its questioning and selection of the jury in this case, your answers will be kept in the strictest confidence by the judge and attorneys involved and will be destroyed after this case is concluded.

YOU ARE PROHIBITED FROM CONDUCTING ANY INTERNET OR INDEPENDENT RESEARCH ON ANY WORD, PHRASE OR NAME IN THIS QUESTIONNAIRE, OR ANYTHING HAVING TO DO WITH THIS CASE. DO NOT EMAIL, BLOG, TWEET, TEXT OR POST ANYTHING TO SOCIAL MEDIA SITES, BLOGS, ETC. ABOUT THIS TRIAL OR QUESTIONNAIRE. DO NOT VISIT ANY FORUMS OR "CHAT" ROOMS WHERE THIS CASE OR INFORMATION ABOUT THIS CASE MAY BE DISCUSSED.

#### Brief Summary of the Case:

This class action case is brought by plaintiff MSP Recovery Claims, Series LLC ("MSPRC"), as a Third-Party Payor (TPP) class representative, via its two assignors EmblemHealth and SummaCare, on behalf of a class of third-party payors. The case is against three sets of pharmaceutical defendants:

- Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceuticals Inc., Solco Healthcare U.S. LLC (collectively "ZHP")
- Teva Pharmaceuticals USA, Inc., Actavis LLC, Actavis Pharma, Inc. (collectively "Teva"); and
- Torrent Pharmaceuticals Ltd., and Torrent Pharma, Inc. (collectively "Torrent")

The Plaintiff seeks reimbursement for the cost of defendants' valsartan medications, primarily prescribed to treat high blood pressure, which were paid on behalf of insured individuals under their health insurance plans. The valsartan medications were recalled because the pills were contaminated with impurities known as N-Nitrosodimethylamine (NDMA) and N-

Nitrosodiethylamine (NDEA) that developed during the manufacturing of the drug's active pharmaceutical ingredient, known as API. NDMA and NDEA are classified as genotoxic probable human carcinogens. Plaintiffs allege that as a result of the presence of the contaminants/impurities, the drugs were rendered "worthless," and Plaintiffs have brought claims for breach of express warranty, violation of certain consumer protection statutes, and fraud.

Defendants deny that the amounts of NDMA led to any increased risk to patients. They assert that the potential for the formation of NDMA was previously unknown, and that Defendants complied with applicable regulations, guidance, and product specifications; therefore Defendants deny any alleged breach of warranty or wrongdoing. Defendants also assert that the valsartan medications delivered the intended therapeutic benefits, despite the presence of the impurity, and therefore deny that plaintiffs suffered any economic loss.

Defendants deny Plaintiffs claims and assert that they complied with applicable regulations, guidance, and product specifications; therefore Defendants deny any alleged breach of warranty or wrongdoing, and deny that plaintiffs suffered any economic loss.

**Commented [A1]:** Issue 1: Defendants' proposed statement

**Commented [A2]:** Issue 1: Plaintiffs object to Defendants' proposed statement and propose this alternative statement

PLEASE COMPLETE THE FOLLOWING QUESTIONS:

1. Name:

\_\_\_\_\_  
Last Name

\_\_\_\_\_  
First Name

\_\_\_\_\_  
Middle (or Maiden) Name

2. Gender: \_\_\_\_ Male \_\_\_\_ Female \_\_\_\_ Other

3. Date of Birth: \_\_\_\_\_

Age: \_\_\_\_\_ Birthplace: \_\_\_\_\_

4. In what town do you live? \_\_\_\_\_

5. Do you own or rent? \_\_\_\_ Own \_\_\_\_ Rent \_\_\_\_ Other: \_\_\_\_\_

6. What is the highest level of education you have completed?

\_\_\_\_ Less than high school \_\_\_\_ HS graduate \_\_\_\_ GED

\_\_\_\_ Technical/Trade School \_\_\_\_ Some college

\_\_\_\_ Associate's degree (AA) \_\_\_\_ Bachelor's degree

\_\_\_\_ Master's, Ph.D., or other advanced degree

If you have a degree from a college or university, please list the name of the degree and the major field of study: \_\_\_\_\_

7. What is your current employment status?

\_\_\_\_ Full time \_\_\_\_ Part time \_\_\_\_ Retired (since \_\_\_\_\_)

\_\_\_\_\_ Homemaker \_\_\_\_\_ Student \_\_\_\_\_ Disabled (since \_\_\_\_\_)  
\_\_\_\_\_ Unemployed (since \_\_\_\_\_) \_\_\_\_\_ Other (explain: \_\_\_\_\_)

8. Have you or a family member ever owned a business?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, what type and when: \_\_\_\_\_

9. If you are currently employed, please answer the following questions.

Name of your employer: \_\_\_\_\_ How long? \_\_\_\_\_ Years

Position and job duties: \_\_\_\_\_

\_\_\_\_\_

Do you supervise others? \_\_\_\_\_ Yes (how many? \_\_\_\_\_) \_\_\_\_\_ No

10. If you are NOT currently employed, please answer the following questions.

Name of last employer: \_\_\_\_\_

Duration of employment: From \_\_\_\_\_ To \_\_\_\_\_

Reason for leaving the job: \_\_\_\_\_

Position and job duties: \_\_\_\_\_

\_\_\_\_\_

Did you supervise others? \_\_\_\_\_ Yes (how many? \_\_\_\_\_) \_\_\_\_\_ No

11. Please list all other jobs that you have had during the last ten (10) years including the names of your employers and duration of your employment.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

12. Do you read or write any foreign (non-English) languages?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please list: \_\_\_\_\_

13. What is your current marital status? Please check all that apply.

☐ Never married                      ☐ Married (\_\_\_\_ years)  
☐ Separated                              ☐ Divorced  
☐ Widowed                                ☐ Living with partner  
☐ Other (Explain: \_\_\_\_\_)

14. What is/was your spouse's or partner's current or last occupation?

Current: \_\_\_\_\_

Last: \_\_\_\_\_

Name of the current or last employer:

\_\_\_\_\_

How long? From: \_\_\_\_\_ To: \_\_\_\_\_

Position and job duties: \_\_\_\_\_

\_\_\_\_\_

15. If you have children, please list their sex, age and occupation for each:

Sex:      Age:      Occupation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

16. What is your annual household income?

☐ Less than \$15,000                      ☐ Between \$15,000 and \$30,000  
☐ Between \$30,000 and \$50,000                      ☐ Between \$50,000 and \$75,000  
☐ Between \$75,000 and \$100,000                      ☐ Between \$100,000 and \$200,000  
☐ More than \$200,000

17. Do you, a family member, or close personal friend have any special training, work experience or education in the following areas (check all that apply):

INDUSTRY	NO	YES	Please indicate the person (i.e., self, friend, family member) and describe the training, experience, etc.
LAW / LAW OFFICE / COURT			
MEDICINE/HEALTH CARE			
PHARMACEUTICAL			
SCIENCE			
PHARMACY			
INSURANCE			
GOVERNMENT REGULATION			
ECONOMICS			
MANUFACTURING/ QUALITY CONTROL			

18. Have you ever served on a jury? \_\_\_\_ Yes \_\_\_\_ No

If yes, what type of case was it? \_\_\_\_\_

When? \_\_\_\_\_ Were you the foreperson? \_\_\_\_\_

19. Have you or anyone in your family or a close personal friend ever filed a lawsuit or made a claim against a person or company for any reason? (This includes personal injury, contract disputes, or any other kind of lawsuit in any kind of court, or claim whether or not in court.) (*Check all that apply*)

\_\_\_\_ Yes, I sued or made a claim

\_\_\_\_ Yes, family member or close friend sued or made a claim

\_\_\_\_ No

If yes, please briefly state the nature of the lawsuit or claim.

\_\_\_\_\_  
\_\_\_\_\_

If yes, is the lawsuit or claim still pending? \_\_\_\_ Yes \_\_\_\_ No

20. Have you ever had a reason to file a lawsuit or assert a claim but decided not to?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please describe/ explain. \_\_\_\_\_

\_\_\_\_\_

21. Have you or anyone in your family or a close friend ever been sued or had a claim brought against them by another person or company for any reason? (This includes personal injury, contract disputes, or any other kind of lawsuit or claim.) (*Check all that apply*)

\_\_\_\_\_ Yes, I was sued \_\_\_\_\_ Yes, family member/close friend was sued \_\_\_\_\_ No

If yes, please briefly state the nature of the lawsuit or claim.

\_\_\_\_\_

\_\_\_\_\_

22. Please list any civic, political, professional, religious, volunteer and other organizations you are affiliated with:

\_\_\_\_\_

\_\_\_\_\_

Please list any office or position you held: \_\_\_\_\_

23. Do you regularly use any of the following? Please check all that apply.

\_\_\_\_\_ Facebook \_\_\_\_\_ X (Twitter) \_\_\_\_\_ Instagram

\_\_\_\_\_ TikTok \_\_\_\_\_ Truth Social \_\_\_\_\_ LinkedIn

\_\_\_\_\_ My blog site \_\_\_\_\_ Others' blog sites (I post comments)

\_\_\_\_\_ Other Social Networking Sites

24. What newspapers, magazines, television networks, or websites or other sources do you use to get news?

\_\_\_\_\_

25. What topics do you like to follow in the newspaper or on the Internet?

\_\_\_\_\_

26. How knowledgeable are you about the scientific method for evaluating research results?

\_\_\_\_\_ Very            \_\_\_\_\_ Somewhat            \_\_\_\_\_ Not at all

27. What do you like to do in your spare time?

\_\_\_\_\_

28. A plaintiff is a person or company who has brought a lawsuit. Do you have a leaning or bias in favor of or against a plaintiff simply because it has brought a lawsuit?

\_\_\_\_\_ Yes    \_\_\_\_\_ No

If yes, please describe/ explain. \_\_\_\_\_

\_\_\_\_\_

29. A defendant is a person or company against whom a lawsuit has been brought. Do you have a leaning or bias in favor of or against a defendant simply because a lawsuit has been brought against it?

\_\_\_\_\_ Yes    \_\_\_\_\_ No

If yes, please describe/ explain. \_\_\_\_\_

\_\_\_\_\_



30. The number of lawsuits that are filed is:

☐ Often too high ☐ Occasionally too high

☐ Occasionally too low ☐ Often too low ☐ About right

31. The amount of money awarded in lawsuits is:

☐ Often too high ☐ Occasionally too high

☐ Occasionally too low ☐ Often too low ☐ About right

32. Do you have any opinion about the number of lawsuits that are filed?

☐ Yes ☐ No

If yes, please explain: \_\_\_\_\_

33. Do you have any opinion about the amount of money awarded in lawsuits?

☐ Yes ☐ No

If yes, please explain: \_\_\_\_\_

34. Do you have any knowledge or opinions about class action lawsuits?

☐ Yes ☐ No.

If yes, please describe: \_\_\_\_\_

35. Have you or anyone close to you ever had a particularly good or bad experience with any of the following? Check all that apply:

☐ Yes, good experience with a drug

☐ Yes, bad experience with a drug

☐ Yes, good experience with a drug company

☐ Yes, bad experience with a drug company

☐ Yes, good experience with an insurance company

☐ Yes, bad experience with an insurance company

☐ No experiences good or bad

If yes, please describe. \_\_\_\_\_

\_\_\_\_\_

**Commented [A3]:** Issue 2:  
Defendants propose questions 30 and 31 as written.

Plaintiffs object to Defendants' questions 30 and 31, and propose questions 32 and 33 as alternatives, if 30 and 31 are given, then Plaintiffs request that "No opinion" line added.

**Commented [A4]:** Issue 3:  
Plaintiffs propose, and Defendants object to, question 34

36. Have you or anyone close to you ever taken medication for hypertension or high blood pressure? *Check all that apply.*

☐ Yes, I have ☐ Yes, someone close has ☐ No

37. Have you ever decided not to take a medication that was prescribed or recommended for you for any reason?

☐ Yes ☐ No

If yes, please explain.

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38. Do you think a pharmaceutical company would misrepresent the ingredients in their medication to make a profit?

☐ Yes, definitely ☐ Yes, probably ☐ No

39. Do you think pharmaceutical companies accurately represent the ingredients and risks in their drugs?

☐ Yes, definitely ☐ Yes, probably

☐ No, definitely. ☐ No, probably ☐ No opinion

40. Do you think that any exposure to a hazardous substance, no matter how small, will cause injury or disease at some point?

☐ Yes, definitely ☐ Yes, probably

☐ No, definitely ☐ No, probably ☐ No opinion

41. How well do you believe pharmaceutical manufactures warn consumers about the safety risks of their medications?

☐ Very well ☐ Adequately ☐ Inadequately ☐ Poorly

42. Have you or a family member or close personal friend ever taken a medication that has later been recalled?

☐ Yes, I have ☐ Yes, someone close to me has ☐ No

If yes, please answer the following questions.

(1) What is your relationship to that person? \_\_\_\_\_

(2) What was the medication? \_\_\_\_\_

**Commented [A5]:** Issue 4:  
Defendants propose question 38 as written.

Plaintiffs object to Defendants' proposed 38, and propose question 39 as an alternative.

If the Court permits question 38, Plaintiffs request that lines be added for No probably, No definitely, and No Opinion

**Commented [A6]:** Issue 5:  
Defendants propose question 40 as written.

Plaintiffs object to question 40, but if included should include redline answers also

- (3) Do you worry that the medicine may have harmed you/them or will cause harm someday? Yes \_\_\_\_\_ No \_\_\_\_\_

Please explain. \_\_\_\_\_

43. Have you ever decided not to take a prescription drug because you were concerned about safety risks?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ Unsure

If yes or unsure, please identify the product and describe your concerns.

44. Do you have any positive or negative feelings or opinions about pharmaceutical companies?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ Unsure

If yes, or unsure, please explain.

\_\_\_\_\_  
\_\_\_\_\_

45. Do you think there should be more or less government regulation of pharmaceutical companies?

\_\_\_\_\_ More \_\_\_\_\_ Less \_\_\_\_\_ No change needed \_\_\_\_\_ No Opinion

46. How concerned are you about the possibility that there are unsafe impurities and/or contaminants in medications?

\_\_\_\_\_ Very \_\_\_\_\_ Somewhat \_\_\_\_\_ Not at all \_\_\_\_\_ No opinion

47. Have you or anyone close to you ever had cancer? *Check all that apply.*

\_\_\_\_\_ Yes, I have \_\_\_\_\_ Yes, someone close has \_\_\_\_\_ No

48. Have you ever been the victim of fraud or deception?

\_\_\_\_\_ Yes \_\_\_\_\_ No

49. Do you have any opinions about Medicare Advantage health plans?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please describe your opinions.

\_\_\_\_\_  
\_\_\_\_\_

50. Do you have any beliefs or opinion about the United States Food and Drug Administration (“FDA”)?

\_\_\_\_ Yes      \_\_\_\_ No

If yes, please describe your opinions.

51. Please tell us if you agree or disagree with each of the following statements:

A. Pharmaceutical companies will often take short cuts in production to increase profit.

\_\_\_\_ Agree strongly    \_\_\_\_ Agree some    \_\_\_\_ Disagree some    \_\_\_\_ Disagree strongly

Agree strongly      Agree

Disagree strongly      Disagree      No Opinion

B. Pharmaceutical companies do a good job of testing the quality, safety and effectiveness of their medicines before they are put on the market.

\_\_\_\_ Agree strongly    \_\_\_\_ Agree some    \_\_\_\_ Disagree some    \_\_\_\_ Disagree strongly

Agree strongly      Agree

Disagree strongly      Disagree      No Opinion

C. Medications should be proven 100% safe and effective before being made available to the public.

\_\_\_\_ Agree strongly    \_\_\_\_ Agree some    \_\_\_\_ Disagree some    \_\_\_\_ Disagree strongly

Agree strongly      Agree

Disagree strongly      Disagree      No Opinion

**Commented [A7]:** Issue 6: No objections to giving the question. Plaintiffs propose the alternative answer sets in redline.

52. Have you heard of MSP Recovery Claims, Series LLC (“MSPRC”)?

\_\_\_\_ Yes      \_\_\_\_ No      \_\_\_\_ Unsure

If yes or unsure, what have you heard and what impressions do you have of MSPRC?

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53. Have you heard of Emblem Health (“Emblem”)?

☐ Yes ☐ No ☐ Unsure

If yes or unsure, what have you heard and what impressions do you have of Emblem?

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54. Have you heard of SummaCare?

☐ Yes ☐ No ☐ Unsure

If yes or unsure, what have you heard and what impressions do you have of SummaCare?

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55. Have you heard of Zhejiang Huahai Pharmaceuticals (ZHP), Huahai U.S., Inc., Princeton Pharmaceuticals Inc., Solco Healthcare U.S. LLC (collectively “ZHP”)?

☐ Yes ☐ No ☐ Unsure

If yes or unsure, what have you heard and what impressions do you have of Zhejiang Huahai Pharmaceuticals (ZHP), Huahai U.S., Inc., Princeton Pharmaceuticals Inc., Solco Healthcare U.S. LLC (collectively “ZHP”)?

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56. Have you heard of Teva Pharmaceuticals USA, Inc. or Actavis?

☐ Yes ☐ No ☐ Unsure

If yes or unsure, what have you heard and what impressions do you have of Teva or Actavis?

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57. Have you heard of Torrent Pharmaceuticals?

☐ Yes ☐ No ☐ Unsure

If yes or unsure, what have you heard and what impressions do you have of Torrent?

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58. What is your opinion about the ethics of Chinese companies?

☐ Positive ☐ Negative ☐ Neutral

59. What is your opinion about the ethics of Israeli companies?

☐ Positive ☐ Negative ☐ Neutral

60. What is your opinion about the ethics of Indian companies?

☐ Positive ☐ Negative ☐ Neutral

**Commented [A8]:** Issue 7: Defendants propose, and Plaintiffs object to, questions 58, 59, 60

61. Has your confidence in manufacturers of pharmaceutical products increased, decreased, or stayed about the same in the last 5 years?

☐ Increased ☐ Decreased ☐ Stayed about the same

Please explain why. \_\_\_\_\_

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62. Do you know anything about this case from any source other than what is described above?

☐ Yes ☐ No

If so, please briefly explain. \_\_\_\_\_

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52. As a juror, you will be required to accept the law as explained by the court and apply it to the facts regardless of your personal beliefs about what the law is or should be. Can you do this?

☐ Yes ☐ No ☐ Unsure

**Commented [A9]:** Issue 8: Plaintiffs propose, and Defendants object to, question 52.

63. Would you be able to render a verdict in favor of the plaintiffs or defendants regardless of any sympathy you may have for either of the parties?

☐ Yes ☐ No ☐ Unsure

If no or unsure, please briefly explain: \_\_\_\_\_

64. Are you personally familiar with or have you done business with any of the following individuals, firms or companies? (CIRCLE ALL THAT APPLY)

Law Firms and Lawyers: TBD

Witnesses: TBD

65. Do you have any physical, psychological, religious, or other reason which would affect your ability to be a fair and impartial juror in this case?

☐ Yes ☐ No

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

66. Is there anything, whether or not covered in previous questions, which would affect your ability to be a fair and impartial juror or in any way be a problem for you serving on this jury?

☐ Yes ☐ No

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

67. Is there anything else that you feel is important for the parties in this case to know about you or your beliefs?

☐ Yes ☐ No

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

I swear or affirm that the answers provided by me above are true to the best of my knowledge and information.

Signature: \_\_\_\_\_

Print Juror Name: \_\_\_\_\_

Participation No.: \_\_\_\_\_

ADDITIONAL COMMENTS

(list the question number in this questionnaire that relates to any comments)